

Case Number: 18 - CV - 6720 (NGG) (PK)

PROPOSED DISCOVERY PLAN¹			
	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	X		1/30/19
2. Rule 26(a)(1) disclosures exchanged			2/28/19
3. Requests made:			
a. Medical records authorization		X	
b. Section 160.50 releases for arrest records	X		
c. Identification of John Doe/Jane Doe defendants		X	
d. Proposed Stipulation of Confidentiality	X		
4. Procedures for producing Electronically Stored Information (ESI) discussed	X (proposed)		
B. SETTLEMENT			
1. Plaintiff to make settlement demand			5/31/19
2. Defendant to make settlement offer			6/28/19
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)			<i>Parties to inform Court by 4/10/19</i>
4. Settlement Conference (proposed date)			7/10/19 <i>parties to propose new date</i>
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings			Within 30 days of the Court's disposition of all Rule 12 motions, subject to the applicable statute of limitation.
2. Initial documents requests and interrogatories			4/10/19
3. All fact discovery to be completed (including disclosure of medical records)			12/20/19
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			12/20/19
5. Expert discovery (only if needed) Check here if not applicable <input type="checkbox"/>			

¹ City defendants object to discovery proceeding in this matter while their motion pursuant to Rule 12 is pending, and will submit a more complete statement of their position to the Court separately.

Plaintiff expert proposed field of expertise:	Policies and practices regarding wiretapping		
Defendant expert proposed field of expertise:			
	DONE	NOT APPLICABLE	DATE
a. Case-in-chief expert report due			1/31/20
b. Rebuttal expert report due			2/28/20
c. Depositions of experts to be completed			4/3/20
6. Completion of ALL DISCOVERY			4/3/20
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			4/6/20
8. If District Judge requires Pre-Motion Conference, date to make request			4/17/20
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule			
10. Joint Pre-Trial Order due (if no dispositive motion filed)			5/15/20
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
2. All parties consent to Magistrate Judge jurisdiction for trial?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases			
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification			Within 90 days of the Court's disposition of all Rule 12 motions.
a. Response due			30 days from Rule 23 motion
b. Reply due			15 days from opposition.

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Peggy Kuo
PEGGY KUO
 United States Magistrate Judge

3/27/19
 Date